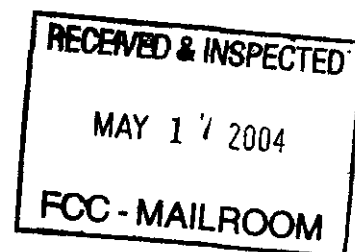


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May 11, 2004

Federal Communications Commission
445 12th Street SW, Room 6C-447
Washington, DC 20554



Re: Docket Number CC-98-67 and CG 03-123

Dear FCC:

I am a deaf consumer of broadband service and the reason for this letter is to encourage you to look into the issue of our local internet service provider not providing the minimum standards required for successful video relaying service (VRS). The download speed is not a problem, but the upload speed is way too low and I have to pay an additional \$35 a month to get the higher upload speed. There should be a standard minimal upload speed for all the internet service providers to offer to see the successful growth of video relay service that is rapidly expanding throughout the country. Too often the deaf people are at a disadvantage and have to pay more money to get the right kind of services. I hope this letter will give you a better perspective of what's going on and you as a government agency can offer some solutions to the fast growing internet service providers to meet the deaf people's needs to successfully use the VRS with the appropriate upload speed of at least 256 Kbps.

When it comes to determining mandatory standards and services, please consider the broadband speed. As you probably know, download and upload speeds must be at least 256 bkps for visual clarity of the signer so that jerky movements do not occur. Most DSL providers meet the download speed requirements, but fail to meet the minimum required for upload speed. As far as I know, some cable modem broadband providers do meet the minimum requirements for both download and upload, but not in Springfield, Illinois where I live. A company installing the VRS equipment refused to install at my house unless I get the higher upload speed which I did. For that, I am paying \$35 additional per month and many people in my community cannot afford to do that and are hesitant about getting the VRS equipment because of having to pay the additional cost. In other communities, there are some broadband internet companies that have the minimum upload speeds of at least 256 Kbps and not charging any extra money for that to their customers. This is not right and we would like to see some kind of standardization in the cable and DSL industries. Since different broadband providers offer different levels of services, such as nationwide local access, quality of tech support, upload and download speeds, etc., I feel that all broadband providers for deaf and hard of hearing customers should meet the mandatory requirements so that the individual deaf and hard of hearing consumer can pick the provider that best meets his needs and the cost of providing broadband service so that the VRS is effective at residential rates.

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Another area of concern is the cost of the equipment and broadband service to the deaf and hard of hearing consumers with poor command of the English language. With the fast growth of telecommunications, more and more deaf and hard of hearing people are unable to afford the monthly cost of broadband services. This group of people with limited income has the greatest need for VRS. These people with limited income as a group have minimal English skills or very poor command of the English language and find existing technology which relies heavily on written English and being able to read English, difficult at best, requiring that the English be adulterated to the simplest level possible. Now the growth of VRS provides this group of deaf and hard of hearing people with limited income and poor mastery of the English language an opportunity to express themselves in the language with which they are most comfortable, ASL, and to receive communication from one speaking in English via an interpreter using the person's native language, ASL. In your deliberations regarding the VRS, please consider how the VRS can be made affordable to this group of people for whom accessible communication in an oral, English speaking world has been so limited, and yet is so vital in their being inclusive in our American society.

In summary, I ask that you consider:

- 1) Making broadband upload and download speeds for VRS users be at a speed for smooth functioning and at rates similar to that charged for residential broadband customers that do not need the faster upload speeds.
- 2) Consider how to make the VRS technology with the required VRS broadband speeds available to those deaf and hard of hearing people with limited income, who, as a group, have the greatest need for the VRS.

In closing, I request that this letter be put in the formal file on relay services, Docket Number CC-98-67 and CG 03-123

Sincerely,



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